



STATE OF WASHINGTON
GAMBLING COMMISSION

"Protect the Public by Ensuring that Gambling is Legal and Honest"

March 12, 2013

Michael Templeman
Paradigm Table Games Inc.
30376 Esperanza Suite 100
Rancho Santa Margarita, CA 92688

RE: Lucky Stiff

Dear Mr. Templeman,

Thank you for requesting approval to market the card game "Lucky Stiff" to Washington State commercial card rooms and Tribal casinos. Based on our review of the documentation we received from Paradigm Table Games Inc., the Washington State Gambling Commission will approve the game under the conditions listed below:

Commercial Card Rooms

- The game shall be played and operated under the terms and conditions set forth under the "Lucky Stiff – Rules of Play" you provided and which are enclosed.
- Commercial card room operators seeking to operate this game must first submit their internal controls and receive approval from the Commission prior to implementing.
- Manufacturers and distributors of graphic layouts and/or any other equipment associated with the game must be licensed by the state prior to the sale of the equipment.

Tribal Casinos

- The game shall be played and operated under the terms and conditions set forth under the "Lucky Stiff – Rules of Play" you provided.
- Each Tribal Gaming Operation must request and obtain approval from their respective Tribal Gaming Agencies (TGA).
- Before TGA allows your game to operate, they will seek concurrence from our agency as well.



- In addition to your approved rules, the Tribal submission to us must include all supplemental information required by Tribal-State Compact Appendix A, Section 18.
- Manufacturers and distributors of graphic layouts and/or any other equipment associated with the game must be certified by the state and licensed by the Tribe prior to the sale of the equipment.

Please be advised that the Financial Investigations Unit is currently reviewing your game application for any new substantial interest holders, as defined by WAC 230-03-045, related to this game and may be contacting you.

Furthermore, any modifications to this game may affect this approval. Contact the Commission should you contemplate modifications. If you have any questions on commercial implementation, please contact Jess Lohse at (425) 277-7017. If you have any questions on Tribal implementation, please contact Kelly Main at (206) 423-4260.

Thank you for your cooperation and willingness to comply with the gambling laws of Washington State.

Sincerely,



Tina Griffin
Assistant Director
Licensing Operations Division

Enclosure

cc: Mark Harris, Assistant Director Field Operations
Julie Lies, Assistant Director Tribal Gaming Division
Jess Lohse, Special Agent Field Operations
Kelly Main, Special Agent Supervisor Tribal Gaming
File



Training Manual

Version 3.0

Washington State Version

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Overview

Lucky Stiff™ is an optional bet designed for regular multi-deck blackjack that uniquely combines elements of both luck and skill. When making the optional Lucky Stiff wager, a player is betting on getting a blackjack or 'stiff' hand using the first two cards. After the initial deal, the Lucky Stiff wager wins immediately if player gets a blackjack or stiff pair (66, 77, or 88), and qualifies to win if player gets any unpaired stiff hand. If the player is not initially dealt a blackjack, stiff pair or an unpaired stiff hand, the Lucky Stiff wager loses and is collected.

Lucky Stiff wagers on qualified unpaired stiff hands win based on the outcome of the player's blackjack hand. After the player and dealer's hands are played out according to house rules, if the player's hand beats the dealer's hand in the main blackjack game after starting the hand with an unpaired stiff hand, the player's Lucky Stiff wager will win. If the player's hand loses to the dealer's hand on the main game, the player's Lucky Stiff wager will lose. If the player's hand pushes with the dealer's hand on the main game, the player's Lucky Stiff wager will push.

NOTE: A stiff hand is defined as any HARD total of 12 through 16 made with the player's first two cards. A stiff pair is a pair of 6's, 7's or 8's on the initial blackjack deal. An unpaired stiff hand is any other initial two card total of HARD 12 through 16.

Lucky Stiff Rules (Payouts Refer to Paytable #1)

1. Lucky Stiff is standard blackjack with an optional bonus wager. All rules pertaining to blackjack as posted on the WSGC website will remain the same and are not altered in this game except as noted in these rules of play.
2. Player makes an optional wager on the Lucky Stiff betting spot at the same time the required wager is made on the main game, before the initial two cards are dealt.
3. After the initial deal:

- (a) If the player has a stiff pair (66, 77, 88), the player's Lucky Stiff wager wins 10-1.
 - (b) If player has a blackjack, the player's Lucky Stiff wager wins and is paid 1 to 1.
 - (c) If the dealer has a blackjack and the player does not have a stiff pair or a blackjack, the player's Lucky Stiff wager loses.
 - (d) If the dealer does not have a blackjack and the player has an unpaired stiff hand, the player's Lucky Stiff wager qualifies to win and will be resolved based on the outcome of the player's blackjack hand.
 - (e) If the dealer does not have a blackjack and the player doesn't have a blackjack, stiff pair or an unpaired stiff hand, the player's Lucky Stiff wager loses and is collected after the initial deal.
4. Following the initial deal, blackjack resumes in the normal house manner. If the player wins the main blackjack wager, player's remaining Lucky Stiff wager (that qualified after the initial deal) also wins and is paid 5 to 1. If the player's main blackjack wager loses, the player's Lucky Stiff wager also loses. If the player's main blackjack wager pushes, the player's Lucky Stiff wager also pushes.
5. When offering Lucky Stiff, Card Room operators must not allow wagering limits to exceed the authorized limits set out in WAC 230-15-040 and WAC 230-15-140.

Dealing Procedures

1. Follow regular blackjack house shuffle and bet casing procedures.
2. After the initial deal, check for player blackjacks and player stiff pairs (66, 77 or 88):
 - (a) If a player has a blackjack, pay the player's Lucky Stiff optional wager 1 to 1 and push the Lucky Stiff wager and the winnings back to the player.
 - (b) If the player has a stiff pair (66, 77 or 88), pay the player's Lucky Stiff optional wager 10 to 1 and push the Lucky Stiff wager and the winnings back to the player.
3. If the player does not have a blackjack, stiff pair or an unpaired stiff hand (a hard total of 12 through 16), collect the player's Lucky Stiff wager.

4. After all initial wins and losses of Lucky Stiff wagers have been resolved, resume the normal house procedures for offering insurance on dealer upcards of Ace and checking for dealer blackjack on dealer upcards of ten.
5. After checking for dealer blackjacks, continue dealing blackjack in the normal house manner. When dealer's hand is completed, resolve all remaining wagers (main and side bet) in the normal fashion, taking losers and paying winners. Lucky Stiff winners based on beating the dealer are paid 5 to 1.

Pay Table #1

LUCKY STIFF PAYS	
INSTANT WINNERS	
66, 77, or 88	10 to 1
Blackjack	1 to 1
BEAT THE DEALER	
Stiff Winner	5 to 1
Ties Push	
Stiff Hand is Initial Hard 12 - 16	
Stand or Hit to Beat the Dealer	

Alternate Pay Tables Available

Strategy

Players will minimize the house edge by following basic blackjack strategy with the following exceptions:

- a. When the dealer stands on a soft 17:
 - Stand on hard 12 vs. 3, stand on hard 15 vs. T, stand on hard 16 vs. 9 and T, hit hard 17 vs. A (e.g., player T-5-2 against dealer Ace up).
- b. When the dealer hits on a soft 17:
 - As above, except the player should **not** hit a hard 17 vs. A (standing as normal), but should also stand on hard 12 vs. 2 **unless** that hard 12 is a T-2, which should be hit as normal.

When the Lucky Stiff bet is in play, following basic blackjack strategy (without the above adjustments) increases its house edge by approximately 0.3%; following optimal strategy for the Lucky Stiff bet when applicable increases the house edge on the main blackjack bet by just over 0.1%.



LUCKY STIFF PAYS

INSTANT WINNERS

66, 77 or 88 10 to 1
 Blackjack 1 to 1

BEAT THE DEALER

Stiff Winner 5 to 1
 Ties Push

Stiff Hand is Initial Hard 12-16
 Stand or Hit to Beat the Dealer

Insurance Bet & Banner At Casino Discretion

WSGC

FEB 20 2013

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